

1 Jonathan A. Rich, Esq.
2 Nevada Bar No.: 15312
COZEN O'CONNOR
3 500 North Rainbow Blvd., Suite 300
4 Las Vegas, NV 89107
Telephone: (702) 470-2324
Facsimile: (702) 470-2359
Email: JARich@cozen.com

6 | Attorney for Defendant
Perry Johnson & Associates, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 LINDA KAUFMAN, individually and on behalf
of all others similarly situated,

CASE NO.: 2:23-cv-01935

12 Plaintiff,

V.

14 | NORTHWELL HEALTH, INC. and PERRY
15 | JOHNSON & ASSOCIATES, INC.,

Defendants.

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF LINDA KAUFMAN'S
COMPLAINT**

(FIRST REQUEST)

Plaintiff Linda Kaufman, individually and on behalf of all others similarly situated, (“Plaintiff”) and Defendants Perry Johnson & Associates, Inc. (“PJ&A”) and Northwell Health, Inc. (“Northwell” and, collectively with PJ&A, “Defendants”) stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff’s complaint in the above-captioned action (the “Complaint”) until **March 1, 2024**.

Plaintiff filed the Complaint on November 21, 2023 and served PJ&A on November 28, 2023. Northwell executed a waiver of service that was entered on November 28, 2023.

On December 8, 2023, a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C.

1 § 1407 (the “Motion”) was filed in the Judicial Panel on Multidistrict Litigation (“JPML”). *See In*
2 *re Perry Johnson & Associates Medical Transcription Data Security Breach Litigation*, Case MDL
3 No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the potential consolidation
4 and transfer of at least forty-five related putative class action complaints. The JPML heard oral
5 arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
9 included as Appendix A. As nearly every party has agreed that centralization is proper, the primary
10 question for the JPML is *where* to centralize the cases, not *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of
12 time for this deadline. The parties respectfully submit that there is good cause for this extension and
13 the requested extension is not for the purpose of delay.

14 / / /

15 / / /

16 IT IS SO STIPULATED.

17

18

19

20

21

22

23

24

25

26

27

28

1 Dated: January 26, 2024.

2 SNELL & WILMER LLP

3 By: /s/ Alex L. Fugazzi

Alex L. Fugazzi (NV Bar #9022)
Aleem A. Dhalla (NV Bar #14188)
3883 Howard Hughes Parkway, Ste 1100
Las Vegas, NV 89169-5958
Telephone: (702) 784-5200
afugazzi@swlaw.com
Adhalla@swlaw.com

7 William L. Roberts*
8 Kathryn E. Caldwell*
9 Andrew B. Cashmore*
ROPS & GRAY LLP
Prudential Tower
10 800 Boylston Street
Boston, Massachusetts 02199-3600
Phone: (617) 951-7000
Fax: (617) 951-7050
william.roberts@ropesgray.com
kathryn.caldwell@ropesgray.com
andrew.cashmore@ropesgray.com

14 Glen J. Dalakian II*
15 ROPS & GRAY LLP
1211 Avenue of the Americas
New York, New York 10036-8704
16 Phone: (212) 596-9000
Fax: (212) 596-9090
glen.dalakian@ropesgray.com

18 Counsel for Defendant Northwell
Health, Inc.

19 *pro hac vice forthcoming

20 Dated: January 26, 2024.

21 COZEN O'CONNOR

22 By: /s/ Jonathan A. Rich

Jonathan A. Rich (NV Bar #15312)
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
Phone: (702) 470-2324
Fax: (702) 470-2359
jarich@cozen.com

27 Counsel for Defendant Perry Johnson & Associates, Inc.

Dated: January 26, 2024.

STRANCH, JENNINGS & GARVEY,
PLLC

By: /s/ Nathan R. Ring

Nathan R. Ring (NV Bar #12078)
3100 W. Charleston Blvd, Suite 208
Las Vegas, NV 89102
Phone: (725) 235-9750
nring@stranchlaw.com

M. Anderson Berry (pro hac vice)
CLAYEO C. ARNOLD, A PROFESSIONAL
CORPORATION
865 Howe Avenue
Sacramento, California 95825
Phone: (916) 239-4778
aberry@justice4you.com

Counsel for Plaintiff and Putative Class

IT IS SO ORDERED.



U.S. MAGISTRATE JUDGE

Dated: January 29, 2024